

Los Angeles County Municipal Storm Water Permit (Order 01-182)
Individual Annual Report Form
Attachment U-4

This form summarizes the requirements in Order No. 01-182. Each Permittee must complete this form in its entirety, except for those requirements applicable only to the Principal Permittee. Only report activities that were performed during the previous fiscal year. Upon completion, this form shall be submitted to the Principal Permittee, by the date specified by the Principal Permittee, for inclusion in the unified Annual Storm Water Program Report. Attachments should be included where necessary to provide sufficient information on program implementation.

The goals of this Report are to: 1) concisely document implementation of the Storm Water Quality Management Program (SQMP) during the past fiscal year; 2) evaluate program results for continuous improvement; 3) to determine compliance with Order 01-182; and 4) to share this information with other Permittees, municipal decision makers, and the public.

!	YOU MUST FILL OUT ALL THE INFORMATION REQUESTED <i>Do not leave any of the sections blank.</i>
N/A	If the question does not apply to your municipality, please indicate N/A in the space provided and provide a brief explanation
U	If the information requested is currently unavailable, please indicate U in the space provided and give a brief explanation.

This Report Form consists of the following sections:

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A. Permittee Name: City of Bradbury

B. Permittee Program Supervisor: Dominic Milano

Title: **City Engineer**

Address: **600 Winston Avenue**

City: **Bradbury**

Zip Code: **91010**

Phone: **626-358-3218**

Fax: **626-303-5154**

- C. In the space below, briefly describe how the storm water program is coordinated within your agency's departments and divisions. Include a description of any problems with coordination between departments. To facilitate this, complete the Table 1.

Most City services are contracted out providing permit issuance, inspections, and maintenance and code enforcement. All activities are coordinated through the City Manager and contract agencies. Engineering – RKA Consulting Group, Building – VCA Code Group, Street Sweeping – RF Dickson, Trash Collection – Burrtec Waste Services, Planning – LDM Associates Inc., Public Works – RKA Consulting Group/Los Angeles County Department of Public Works.

TABLE 1 - Program Management

Storm Water Management Activity	Division/Department	# of Individuals Responsible for Implementing
1. Outreach & Education	City/RKA Consulting Group	2
2. Industrial/Commercial Inspections	N/A	
3. Construction Permits/Inspections	RKA Consulting Group/VCA Code Group	3
4. IC/ID Inspections	LACDWP	
5. Street sweeping	RF Dickson	2
6. Catch Basin Cleaning	LACDPW	
7. Spill Response	LACDPW	
8. Development Planning (project/SUSMP review and approval)	RKA Consulting Group/LDM Associates, Inc.	3

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D. Staff and Training

Attach a summary of staff training over the last fiscal year. This shall include the staff name, department, type of training, and date of training.

E. Budget Summary

1. Does your municipality have a storm water utility? Yes ☐ No ☒

If no, describe the funding source(s) used to implement the requirements of Order No. 01-182.

General Fund and Gas Tax.

2. Are the existing financial resources sufficient to accomplish all required activities? Yes ☐ No ☒

3. Complete Table 2 to the extent that accurate information is available (indicate U in the spaces where the information is unavailable), and report any supplemental dedicated budgets for the same categories on the lines below the table.

4. List any additional state/federally funded projects related to storm water.

None

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Program Element	Expenditures in Previous Fiscal Year	Estimated Amount Needed to implement Order 01-182
1. Program management		
a. Administrative costs	12,263	12,263
b. Capital costs	0	0
2. Public Information and Participation		
a. Public Outreach/Education	1,530	1,530
b. Employee Training	100	100
c. Corporate Outreach	0	0
d. Business Assistance	0	0
3. Industrial/Commercial inspection/ site visit activities	0	0
4. Development Planning	9,206	9,206
5. Development Construction		
a. Construction inspections	1,858	1,858
6. Public Agency Activities		
a. Maintenance of structural and treatment control BMPs	0	0
b. Municipal street sweeping	4,800	4,800
c. Catch basin cleaning	170	170
d. Trash collection/recycling	0	0
e. Capital costs	0	0
f. Other	0	0
7. IC/ID Program		
a. Operations and Maintenance	0	0
b. Capitol Costs	0	0
8. Monitoring	0	0
9. Other	0	0
10. TOTAL	\$29,927	\$29,927

List any supplemental dedicated budgets for the above categories:

None

List any activities that have been contracted out to consultants/other agencies:

Street sweeping, trash collection, hazardous material spill response, catch basin cleaning, construction inspections, and e-waste collection.

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II. Receiving Water Limitations (Part 2)

- A. Are you aware, or have you been notified, of any discharges from your MS4 that cause or contribute to a condition of nuisance or to the violation of any applicable water quality standards? Yes ☐ No ☒
- B. Has the Regional Board notified you that discharges from your MS4 are causing or contributing to an exceedance of water quality standards? Yes ☐ No ☒
- C. If you answered Yes to either of the above questions, you must attach a Receiving Water Limitations (RWL) Compliance Report. The Report must include the following:
1. A description of the pollutants that are in exceedance and an analysis of possible sources;
 2. A plan to comply with the RWL (Permit, Part 2);
 3. Changes to the SQMP to eliminate water quality exceedances;
 4. Enhanced monitoring to demonstrate compliance; and
 5. Results of implementation.

III. SQMP Implementation (Part 3)

- A. Has your agency implemented the SQMP and any additional controls necessary to reduce the discharges of pollutants in storm water to the maximum extent practicable? Yes ☒ No ☐
- B. If your agency has implemented additional or different controls than described in the countywide SQMP, has your agency developed a local SQMP that reflects the conditions in its jurisdiction and specifies activities being implemented under the appropriate elements described in the countywide SQMP? Yes ☐ No ☒
- C. Describe the status of developing a local SQMP in the box below.

The City of Bradbury is a small residential community with three (3) full time employees.

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- D. If applicable, describe an additional BMP, in addition to those in the countywide SQMP, that your city has implemented to reduce pollutants in storm water to the maximum extent practicable.

None

E. Watershed Management Committees (WMCs)

1. Which WMC are you in? **San Gabriel River**
2. Who is your designated representative to the WMC? **Michelle Keith**
3. How many WMC meetings did you participate in last year? **6**
4. Describe specific improvements to your storm water management program as a result of WMC meetings.

The City is kept aware of current issues related to the storm water program and through this effort can respond with its limited resources to areas which are critical at the moment.

5. Attach any comments or suggestions regarding your WMC.

F. Storm Water Ordinance

1. Have you adopted a storm water and urban runoff ordinance to enforce all requirements of Order 01-182? Yes ☒ No ☐
If not, describe the status of adopting such an ordinance.

2. If yes, have you already submitted a copy of the ordinance to the Regional Board? Yes ☒ No ☐
If not, please attach a copy to this Report.

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3. Were any amendments made to your storm water ordinance during the last fiscal year? Yes ☐ No ☒
If yes, attach a copy of amendments to this Report.

G. Discharge Prohibitions

1. List any non-storm water discharges you feel should be further regulated:

None

2. List any non-storm water discharges you feel should be exempt, and provide an explanation for each:

None

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In addition to answering the following questions, attach a summary of all storm water education activities that your agency conducted or participated in last year.

1. No Dumping Message

a) How many storm drain inlets does your agency own? **8**

b) How many storm drain inlets were marked with a no dumping message in the last fiscal year? **0**

c) What is the total number of storm drain inlets that are legibly marked with a no dumping message? **8**

If this number is less than the number in question 1.b, describe why all inlets have not been marked, the process used to implement this requirement, and the expected completion date.

d) How many public access points to creeks, channels, and other water bodies within your jurisdiction have been posted with no dumping signage in the past year? **0**

Describe your agency's status of implementing this requirement by the date required in Order No. 01-182.

The City of Bradbury has complied with Order No. 01-182 and is awaiting the next permit to be issued.

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2. Reporting Hotline

- a) Has your agency established its own hotline for reporting and for general storm water management information? Yes ☐ No ☒
- b) If so, what is the number?
- c) Is this information listed in the government pages of the telephone book? Yes ☐ No ☒
- d) If no, is your agency coordinated with the countywide hotline? Yes ☒ No ☐
- e) Do you keep record of the number of calls received and how they were responded to? Yes ☐ No ☒
- f) How many calls were received in the last fiscal year? 1
- g) Describe the process used to respond to hotline calls.

Upon receiving a call, it is forwarded to the appropriate personnel to investigate. After investigation/inspection, the staff issues the appropriate order to address the problem and it is filed for follow-up.

- h) Have you provided the Principal Permittee with your current reporting contact information? Yes ☒ No ☐
- i) Have you compiled a list of the general public reporting contacts for all Permittees and posted it on the www.888CleanLA.com web site (Principal Permittee only)? Yes ☐ No ☐
- If not, when is this scheduled to occur?

3. Outreach and Education

- a) Describe the strategy developed to provide outreach and bilingual materials to target ethnic communities. Include an explanation of why each community was chosen as a target, how program effectiveness will be determined, and status of implementation. (Principal Permittee only)

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- b) Did the Principal Permittee organize quarterly Public Outreach Strategy meetings that you were aware of? Yes ☒ No ☐

How many Public Outreach Strategy meetings did your agency participate in last year? **1**

Explain why your agency did not attend any or all of the organized meetings.

Information obtained through alternate sources.

Identify specific improvements to your storm water education program as a result of these meetings:

List suggestions to increase the usefulness of quarterly meetings:

If quarterly Public Outreach Strategy meetings were not organized, explain why not and when this requirement will be implemented (*Principal Permittee only*).

- c) Approximately how many impressions were made last year on the general public about storm water quality via print, local TV, local radio, or other media? **9,000**
- d) Describe efforts your agency made to educate local schools on storm water pollution.

Bradbury students attend the schools within the Duarte Unified School District and participate in those programs.

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- e) Did you provide all schools within each school district in Los Angeles County with materials necessary to educate a minimum of 50 percent of all school children (K-12) every 2 years on storm water pollution (*Principal Permittee only*)? Yes ☐ No ☐
If not, explain why.

- f) Describe the strategy developed to measure the effectiveness of in-school educational programs, including assessing students' knowledge of storm water pollution problems and solutions before and after educational efforts (*Principal Permittee only*).

For Permit Years 2-5, attach an assessment of the effectiveness of in-school storm water education programs.

- g) What is the behavioral change target that was developed based on sociological data and other studies (*Principal Permittee only*)?

If no target has been developed, explain why and describe the status of developing a target.

What is the status of meeting the target by the end of Year 5?

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4. Pollutant-Specific Outreach

- a) Attach a description of each watershed-specific outreach program that your agency developed (*Principal Permittee only*). All pollutants listed in Table 1 (Section B.1.d.) must be included.
- b) Did your agency cooperate with the Principal Permittee to develop specific outreach programs to target pollutants in your area? Yes ☒ No ☐
- c) Did your agency help distribute pollutant-specific materials in your city? Yes ☒ No ☐
- d) Describe how your agency has made outreach material available to the general public, schools, community groups, contractors and developers, etc...

Pollution prevention material is available at City Hall, on the City website, and included in the monthly mailing of the "Bradbury News" newsletter. Contractors with current projects are educated by site inspections and as necessary, individual notification.

5. Businesses Program

- a) Briefly describe the Corporate Outreach Program that has been developed to target gas stations and restaurant chains (*Principal Permittee only*).

- b) How many corporate managers did your agency (*Principal Permittee only*) reach last year?
- c) What is the total number of corporations to be reached through this program (*Principal Permittee only*)?
- d) Is your agency meeting the requirement of reaching all gas station and restaurant corporations once every two years (*Principal Permittee only*)? Yes ☐ No ☐
If not, describe measures that will be taken to fully implement this requirement.

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- e) Has your agency developed and/or implemented a Business Assistance Program? Yes ☐ No ☒

If so, briefly describe your agency's program, including the number of businesses assisted, the type of assistance, and an assessment of the program's effectiveness.

6. Did you encourage local radio stations and newspapers to use public service announcements? Yes ☐ No ☒

How many media outlets were contacted? 0

Which newspapers or radio stations ran them?

Who was the audience?

7. Did you supplement the County's media purchase by funding additional media buys? Yes ☐ No ☒

Estimated dollar value/in-kind contribution:

Type of media purchased:

Frequency of the buys:

Did another agency help with the purchase? Yes ☐ No ☒

8. Did you work with local business, the County, or other Permittees to place non-traditional advertising? Yes ☐ No ☒

If so, describe the type of advertising.

9. Did you establish local community partnerships to distribute educational storm water pollution prevention material? Yes ☐ No ☒

Describe the materials that were distributed:

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Who were the key partners?

Who was the audience (businesses, schools, etc.)?

10. Did you participate in or publicize workshops or community events to discuss storm water pollution? Yes ☒ No ☐

How many events did you attend? 3

11. Does your agency have a website that provides storm water pollution prevention information? Yes ☐ No ☒

If so, what is the address?

12. Has awareness increased in your community regarding storm water pollution? Yes ☒ No ☐

Do you feel that behaviors have changed? Yes ☒ No ☐

Explain the basis for your answers. Include a description of any evaluation methods that are used to determine the effectiveness of your agency's outreach.

Bradbury residents are a well educated group that are leaders in business and industry. Stormwater public education material is broadcasted on the radio, television, and billboards. The residents and business owners recognize the benefits that can be gained by implementing and utilizing the information.

13. How would you modify the storm water public education program to improve it on the City or County level?

Continue efforts to broaden audience receiving the information.

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Category	Number of facilities inspected by category in this reporting year	Number of facilities identified as adequately implementing BMPs as specified in this reporting year	% adequately implementing out of total in this reporting year	Number of facilities required to implement or upgrade in this reporting year	Number of facilities inspected by category in this reporting cycle	Number of facilities identified as adequately implementing BMPs as specified in this reporting cycle	% adequately implementing out of total in this reporting cycle	Number of facilities required to implement or upgrade in this reporting cycle	Total Number during this permit adequately implementing	Total Number during this permit required to implement or upgrade
Landfills	N/A									
...										

Comments/Explanation/Conclusion:

4. Enforcement Activities

Provide the reporting data as suggested in the following tables.

Enforcement Actions by categories (e.g. Warning letter, NOV, referral to D.A., etc.)	Number of facilities issued enforcement actions in the reporting year	Number of facilities issued enforcement actions in the current reporting cycle	Number of facilities (re)inspected due to enforcement actions in current reporting year	Number of facilities (re)inspected due to enforcement actions in current reporting cycle	Number of facilities brought into compliance in the current reporting year	Number of facilities brought into compliance in current reporting cycle	Total number of enforcement actions since permit adoption (by category)
0	0	0	0	0	0	0	0

Facilities by category	Number of Warning letters	Number of NOV/s	Number of Referral	Number of Other
Residential	0	0	0	
Comments/Explanation/Conclusion:				

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Please give a brief assessment of the implementation of the program in removing pollutants from the storm water discharges. Please provide an explanation. Suggested improvements or adjustments based on the knowledge gained through this reporting period activities must be reflected in a change in the SQMP, if warranted.

Highly Effective ☐Somewhat Effective ☒Non-effective ☐

Comments/Explanation/Conclusion:

6. You must also submit a quarterly electronic submittal of your Industrial/Commercial Facilities Program activities.

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C. Development Planning Program (Part 4.D)

1. Does your agency have a process to minimize impacts from storm water and urban runoff on the biological integrity of natural drainage systems and water bodies in accordance with requirements under CEQA, Section 404 of the CWA, local ordinances, and other legal authorities? Yes ☒ No ☐
Attach examples showing how storm water quality impacts were addressed in environmental documents for projects over the past year.
2. Does your agency have procedures to include the following requirements in all priority development and redevelopment projects:
 - a) Maximize the percentage of permeable surfaces to allow more percolation of storm water into the ground? Yes ☒ No ☐
 - b) Minimize the quantity of storm water directed to impermeable surfaces and the MS4? Yes ☒ No ☐
 - c) Minimize pollution emanating from parking lots through the use of appropriate treatment control BMPs and good housekeeping practices? Yes ☒ No ☐
 - d) Provide for appropriate permanent measures to reduce storm water pollutant loads from the development site? Yes ☒ No ☐
3. List the types and numbers of BMPs that your agency required for priority projects to meet the requirements described above.

Many residential projects within the City are installing infiltration systems to retain runoff on site. Filtration occurs when the runoff travels through the landscaped areas. Hillside development standards limit the permitted grading and encourages the use of pervious material.

4. Describe the status of the development or implementation of peak flow controls in Natural Drainage Systems.

All projects are required to evaluate the runoff from their property and to maintain the increased runoff caused by development on their property.

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5. Has your agency amended codes and/or ordinances to give legal effect to the SUSMP changes required in the Permit? Yes ☒ No ☐
6. Describe the process your agency uses to include SUSMP design standards in new development and redevelopment project approvals.

Projects are reviewed at the planning and building review stage. The City Engineer determines if the project is a priority project requiring a SUSMP. If so, the SUSMP is recorded to assure that future property owners are aware of the water quality BMPs that were installed and are property maintained.

7. How many of each of the following projects did your agency review and condition to meet SUSMP requirements last year?
- | | |
|---|---|
| a) Residential | 1 |
| b) Commercial | 0 |
| c) Industrial | 0 |
| d) Automotive Service Facilities | 0 |
| e) Retail Gasoline Outlets | 0 |
| f) Restaurants | 0 |
| g) Parking Lots | 0 |
| h) Projects located in or directly adjacent to or discharging directly to an environmentally sensitive area | 0 |
| i) Total number of permits issued to priority projects | 3 |
8. What is the percentage of total development projects that were conditioned to meet SUSMP requirements? **33.33%**
9. How has your agency prepared to reduce the SUSMP threshold for industrial/commercial facilities to 1 acre from 100,000 square feet in 2003?

All projects are reviewed and required to comply. There are no industrial/commercial facilities within the City of Bradbury.

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10. After 2003, how many additional projects per year will require/did require implementation of SUSMP requirements as a result of the lower threshold? **75% of Projects**
11. Does your agency participate in an approved regional or sub-regional storm water mitigation program to substitute in part or wholly SUSMP requirements for new development? Yes ☒ No ☐
12. Has your agency modified its planning procedures for preparing and reviewing CEQA documents to consider potential storm water quality impacts and provide for appropriate mitigation? Yes ☒ No ☐

If no, provide an explanation and an expected date of completion.

13. Did your agency update any of the following General Plan elements in the past year?
- a) Land Use Yes ☐ No ☒
- b) Housing Yes ☒ No ☐ **GPA 08-03**
- c) Conservation Yes ☐ No ☒
- d) Open Space Yes ☐ No ☒

If yes, please describe how watershed and storm water quality and quantity management considerations were included.

The City is in the process of updating the General Plan and it is planning to include enhanced water quality management considerations.

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14. How many targeted staff were trained last year? **2**
15. How many targeted staff are trained annually? **2**
16. What percentage of total staff are trained annually? **50%**
17. Has your agency developed and made available development planning guidelines? Yes ☒ No ☐
18. If no, what is the expected date that guidelines will be developed and available to developers?
19. What is the status of completion of the technical manual for siting and design of BMPs for the development community?

Developers are directed to the Los Angeles County website for information.

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D. Development Construction Program

1. Describe your agency's program to control runoff from construction activity at all construction sites within its jurisdiction.

All projects are required to prepare an erosion and sediment control plan with minimum BMPs which include a stabilized construction entrance, slope stabilization, and sediment controls.

2. Does your agency require the preparation, submittal, and implementation of a Local Storm Water Pollution Prevention Plan (Local SWPPP) prior to the issuance of a grading permit for all sites that meet one or all of the following criteria?

a) Will result in soil disturbance of one acre or greater Yes ☒ No ☐

b) Is within, directly adjacent to, or is discharging directly to an environmentally sensitive area Yes ☒ No ☐

c) Is located in a hillside area Yes ☒ No ☐

3. Attach one example of a local SWPPP **(NOT AVAILABLE)**

4. Describe the process your agency uses to require proof of filing a Notice of Intent for coverage under the State General Construction Activity Storm Water permit and a certification that a SWPPP has been prepared prior to issuing a grading permit?

A grading permit is not issued until a valid WDID number is issued by the State Board for projects disturbing one or more acres of land.

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- | | | |
|----|---|----------|
| 5. | How many building/grading permits were issued to sites requiring Local SWPPPs last year? | 1 |
| 6. | How many building/grading permits were issued to sites requiring coverage under the General Construction Activities Storm Water Permit last year? | 0 |
| 7. | How many building/grading permits were issued to construction site less than one acre in size last year? | 2 |
| 8. | How many construction sites were inspected during the last wet season? | 0 |
| 9. | Complete the table below. | |

Type of Violation	# of Violations	% of Total Inspections	# of Follow-up Inspections	# of Enforcement Actions
Off-site discharge of sediment	0	0	0	0
Off-site discharge of other pollutants	0	0	0	0
No or inadequate SWPPP	0	0	0	0
Inadequate BMP/SWPPP implementation	0	0	0	0

10. Describe the process for taking enforcement actions against construction site violations, including the types of actions that are taken.

During the normal inspection process, the inspector reviews compliance with the Erosion Control Plan with a minimum of 1 visit a month. When violations are noted, the Contractor is given a written notice to correct the violation. If the issue is time sensitive, the Contractor is given a specific time frame for correcting the violation. If it is not corrected within the specified time period, the case is forwarded to the City prosecutor, and if necessary, taken to court for prosecution of the violation.

11. Describe the system that your agency uses to track the issuance of grading permits.

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All active grading and building permits are filed in City Hall. The City of Bradbury is small enough that the inspector can identify all active projects.

E. Public Agency Activities (Part 4.F)

1. Sewage System Maintenance, Overflow, and Spill Prevention
(only applicable to agencies that own and/or operate a sanitary sewer system)

- a) Has your agency developed and implemented a response plan for sanitary sewer overflows that includes the requirements in Order 01-182? Yes ☒ No ☐
- b) How many sanitary sewer overflows occurred within your jurisdiction? **0**
- c) How many did your agency respond to? **0**
- d) Did your agency investigate all complaints received? Yes ☒ No ☐
- e) How many complaints were received? **1**
- f) Upon notification, did your agency immediately respond to overflows by containment? Yes ☒ No ☐
- g) Did your agency notify appropriate sewer and public health agencies when a sewer overflowed to the MS4? Yes ☒ No ☐
- h) Did your agency implement a program to prevent sewage spills or leaks from sewage facilities from entering the MS4? Yes ☒ No ☐

If so, describe the program:

The City has implemented the SSMP as required by the State Board order. The City Sanitary Sewer System is operated and maintained by the LA County Sewer Maintenance Division. City staff have received a memo regarding SSO response procedures.

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- i) Did your agency implement a program to identify, repair, and remediate sanitary sewer blockages, exfiltration, overflow, and wet weather overflows from sanitary sewers to the MS4?

Yes ☒ No ☐

If so, describe the program:

LADPW maintenance contract.**2. Public Construction Activities Management**

- a) What percentage of public construction sites 5 acres or greater in size did your agency obtain coverage under the State of California General Construction Activities Storm Water Discharge Permit ?

100 %

- b) Give an explanation for any sites greater than 5 acres that were not covered:

- c) What is the total number of active public construction sites?

0

How many were 5 acres or greater in size?

0

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- d) (After March, 2003) Did your agency obtain coverage under the State of California General Construction Activities Storm Water Discharge Permit coverage for public construction sites for sites one acre or greater? Yes ☒ No ☐

3. Vehicle Maintenance/Material Storage Facilities/Corporation Yards Management

- a) Did your agency implement pollution prevention plans for each public vehicle maintenance facility, material storage facility, and corporation yard? Yes ☐ No ☒

The City does not operate a corporate yard or own any city vehicles.

- b) Briefly describe how your agency implements the following, and any additional, BMPs to minimize pollutant discharges in storm water:
- (1) Good housekeeping practices
 - (2) Material storage control
 - (3) Vehicle leaks and spill control
 - (4) Illicit discharge control

All residential streets are swept weekly, and recent Civic Center landscaping projects have implemented the planting of native drought-tolerant. The City contracts with LA County for annual catch basin cleaning and "No Dumping" marking.

- c) Are all Permittee owned and/or operated vehicle/equipment wash areas self-contained, covered, equipped with a clarifier, and properly connected to the sanitary sewer? Yes ☐ No ☒
If not, what is the status of implementing this requirement?

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The City does not own or operate a corporate yard or own any city vehicles.

- d) How many Permittee owned and/or operated vehicle/equipment wash areas are scheduled to be redeveloped to include the BMPs listed above? N/A

4. Landscape and Recreational Facilities Management

- a) Has your agency developed a standardized protocol for the routine and non-routine application of pesticides, herbicides (including pre-emergents), and fertilizers?

Yes ☒ No ☐

Briefly describe this protocol:

The City does not own or operate any parkland and the only landscaping the City maintains is a small area along the trail system. The City does not authorize the use of fertilizers or pesticides by its maintenance contractors.

- b) How does your agency ensure that there is no application of pesticides or fertilizers immediately before, during, or immediately after a rain event or when water is flowing off the area to be applied?

The use of fertilizers and pesticides is not authorized for use by maintenance contractors.

- c) Are any banned pesticides, herbicides, fungicides, or rodenticides stored or applied in your agency's jurisdiction that you know of?

Yes ☐ No ☒

If so, list them:

Los Angeles County Municipal Storm Water Permit (Order 01-182)
Individual Annual Report Form
Attachment U-4

- d) What percentage of your agency's staff that apply pesticides are certified by the California Department of Food and Agriculture, or are under the direct supervision of a certified pesticide applicator? **N/A**
- e) Describe procedures your agency has implemented to encourage retention and planting of native vegetation and to reduce water, fertilizer, and pesticide needs:

The City of Bradbury is a small residential community with minimal development. The lots are large and generally left in a natural condition except for the area immediately surrounding the home. The property owners do not irrigate due to the cost of water.

5. Storm Drain Operation and Management

- a) Did your agency designate catch basin inlets within its jurisdiction as Priority A; Priority B; and Priority C? Yes ☒ No ☐
- b) How many of each designation exist in your jurisdiction?
- Priority A:
Priority B:
Priority C: **42**
- c) Is your city subject to a trash TMDL? Yes ☒ No ☐
- d) If yes, describe the activities and/or implementation measures that your agency conducted pursuant to the TMDL and any other trash reduction efforts that occurred.

A portion of the City is within the Los Angeles River Watershed and has completed implementation requirements necessary at this time.

Los Angeles County Municipal Storm Water Permit (Order 01-182)**Individual Annual Report Form****Attachment U-4**

- e) How many times were all Priority A basins cleaned last year? **N/A**
- f) How many times were all Priority B basins cleaned last year? **N/A**
- g) How many times were all Priority C basins cleaned last year? **1**
- h) How much total waste was collected in tons from catch basin clean-outs last year? **0.21**
- i) Attach a record of all catch basins in your jurisdiction. This shall identify each basin as City or County owned, and Priority A, B, or C. For all basins that are owned and operated by your agency, include dates that each was cleaned out over the past year.
- j) Did your agency place and maintain trash receptacles at all transit stops within its jurisdiction. Yes ☐ No ☒
- k) How many new trash receptacles were installed last year? **0**
- l) Did your agency place special conditions for events that generated substantial quantities of trash and litter including provisions that:
- (1) Provide for the proper management of trash and litter generated from the event? Yes ☐ No ☒
 - (2) Arrange for temporary screens to be placed on catch basins? Yes ☐ No ☒
 - (3) Or for catch basins in that area to be cleaned out subsequent to the event and prior to any rain? Yes ☐ No ☒
- m) Did your agency inspect the legibility of the catch basin stencil or labels? Yes ☒ No ☐
What percentage of stencils were legible? **100%**

Los Angeles County Municipal Storm Water Permit (Order 01-182)**Individual Annual Report Form****Attachment U-4**

- n) Were illegible stencils recorded and re-stenciled or re-labeled within 180 days of inspection? Yes ☒ No ☐
- o) Did your agency visually monitor Permittee-owned open channel storm drains and other drainage structures for debris at least annually and identify and prioritize problem areas of illicit discharge for regular inspection? Yes ☐ No ☒
Is the prioritization attached? Yes ☐ No ☒
- p) Did your agency review its maintenance activities to assure that appropriate storm water BMPs are being utilized to protect water quality? Yes ☒ No ☐
What changes have been made?

All service requests are logged and a follow up is conducted to assure proper response was taken and any deficiencies are corrected.

- q) Did your agency remove trash and debris from open channel storm drains a minimum of once per year before the storm season? Yes ☒ No ☐
- r) How did your agency minimize the discharge of contaminants during MS4 maintenance and clean outs?

Contract maintenance company collects and delivers to disposal site.

- s) Where is removed material disposed of?

Proper disposal site.

Los Angeles County Municipal Storm Water Permit (Order 01-182)
Individual Annual Report Form
Attachment U-4

6. Streets and Roads Maintenance

- a) Did your agency designate streets and/or street segments within its jurisdiction as one of the following:
- (1) Priority A – streets and/or street segments that are designated as consistently generating the highest volumes of trash and/or litter? Yes ☐ No ☒
 - (2) Priority B - streets and/or street segments that are designated as consistently generating moderate volumes of trash and/or litter? Yes ☐ No ☒
 - (3) Priority C – streets and/or street segments that are designated as generating low volumes of trash and/or litter? Yes ☒ No ☐
- b) Did your agency perform all street sweeping in compliance with the permit and according to the following schedule:
- (1) Priority A – These streets and/or street segments shall be swept at least two times per month? Yes ☐ No ☒
 - (2) Priority B - Each Permittee shall ensure that each streets and/or street segments is cleaned at least once per month? Yes ☐ No ☒
 - (3) Priority C – These streets and/or street segments shall be cleaned as necessary but in no case less than once per year? Yes ☒ No ☐

Los Angeles County Municipal Storm Water Permit (Order 01-182)**Individual Annual Report Form****Attachment U-4**

- c) Did your agency require that saw cutting wastes be recovered and disposed of properly and that in no case shall waste be left on a roadway or allowed to enter the storm drain? Yes ☒ No ☐
- d) Did your agency require that concrete and other street and road maintenance materials and wastes be managed to prevent pollutant discharges? Yes ☒ No ☐
- e) Did your agency require that the washout of concrete trucks and chutes only occur in designated areas and never into storm drains, open ditches, streets, or catch basins leading to the storm drain system? Yes ☒ No ☐
- f) Did your agency train its employees in targeted positions (whose interactions, jobs, and activities affect storm water quality) regarding the requirements of the storm water management program to:
- (1) Promote a clear understanding of the potential for maintenance activities to pollute storm water? and Yes ☒ No ☐
- (2) Identify and select appropriate BMPs? Yes ☒ No ☐

7. Parking Facilities Management

- a) Did your agency ensure that Permittee-owned parking lots be kept clear of debris and excessive oil buildup and cleaned no less than 2 times per month and/or inspected no less than 2 times per month to determine if cleaning is necessary. Yes ☒ No ☐
- b) Were any Permittee-owned parking lots cleaned less than once a month? Yes ☐ No ☒
How many?

Los Angeles County Municipal Storm Water Permit (Order 01-182)
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Attachment U-4

8. Public Industrial Activities Management
- a) Did your agency, for all municipal activity considered an industrial activity under USEPA Phase I storm water regulations, obtain separate coverage under the State of California General Industrial Activities Storm Water Discharge Permit no later than December 31, 2001? Yes ☐ No ☒
- b) Does your agency serve a population of less than 100,000 people? Yes ☒ No ☐
9. Emergency Procedures
- a) In case of real emergencies, did your agency repair essential public services and infrastructure in a manner to minimize environmental damage? Yes ☒ No ☐
- b) Were BMPs implemented to the extent that measures did not compromise public health and safety? Yes ☒ No ☐
10. Feasibility Study
- a) Did your agency cooperate with the County Sanitation Districts of Los Angeles County to prepare a study which investigates the possible diversion of dry weather flows or the use of alternative treatment control BMPs? Yes ☒ No ☐
- b) Did your agency review its individual prioritized list and create a watershed based priority list of drains for potential diversion and submit a listing of priority diversions to the Regional Board Executive Officer? Yes ☒ No ☐

Los Angeles County Municipal Storm Water Permit (Order 01-182)
Individual Annual Report Form
Attachment U-4

F. Illicit Connections and Illicit Discharges (IC/ID) Elimination Program (Part 4.G)

1. Attach a copy of your agency's IC/ID Elimination Implementation Program (Part 4.G.1.a.).
2. Attach a map of your storm drain system showing all permitted connections (if available), and the locations of all illicit connections and discharges that occurred last year (Part 4.G.1.b). If your agency has not completed this requirement, describe the status of the development of a baseline map, including an expected completion date.

No permitted connections are within the City. No illicit connections and discharges occurred.

3. Describe your enforcement procedures for eliminating illicit discharges and terminating illicit connections.

Upon notification of an illicit discharge, a site inspection is conducted and the source of the discharged is determined. A notice of violation is provided describing the violation, the corrective action to be implemented with a compliance date, and re-inspection date.

4. Describe your record keeping system to document all illicit connections and discharges.

A copy of all correspondence is filed with the NPDES administrator.

Los Angeles County Municipal Storm Water Permit (Order 01-182)
Individual Annual Report Form
Attachment U-4

5. What is the total length of open channel that your agency owns and operates? 0
6. What length was screened last year for illicit connections? 0
7. What is the total length of closed storm drain that your agency owns and operates? 0
8. What length was screened last year for illicit connections? 0
9. Describe the method used to screen your storm drains.

10. Provide the reporting data for illicit connections as suggested in the following table (you may submit a spreadsheet from your database that contains the information).

Year	Total # reported/ identified	Total # investigated	# that conveyed exempt discharges or NPDES permitted	# that conveyed illicit discharges that were terminated	# that were removed	# that resulted in enforcement action	# that resulted in <i>other</i> actions
01/02	0	0	0	0	0	0	0
02/03	0	0	0	0	0	0	0
03/04	0	0	0	0	0	0	0
04/05	0	0	0	0	0	0	0
05/06	0	0	0	0	0	0	0
06/07	0	0	0	0	0	0	0
07/08	0	0	0	0	0	0	0
08/09	0	0	0	0	0	0	0
09/10	0	0	0	0	0	0	0
10/11	0	0	0	0	0	0	0
11/12	0	0	0	0	0	0	0

Los Angeles County Municipal Storm Water Permit (Order 01-182)
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11. Explain any *other* actions that occurred in the last year.

12. What is the average time it takes your agency to initiate an illicit connection investigation after it is reported?

1 hour

a) Were all identified connections terminated within 180 days?

Yes ☒ No ☐

b) If not, explain why.

13. Provide the reporting data for illicit discharges as suggested in the following table (you may submit a spreadsheet from you database that contains this information).

Year	Total # reported	Total # that were discontinued/ cleaned up voluntarily through enforcement and the source was identified	# that were cleaned up but the source could not be identified	# that resulted in no evidence of discharge	# that were determined to be conditionally exempt	# that were exempt or in compliance and the source identified	# that resulted in enforcement action
01/02	4	4	0	0	0	0	0
02/03	7	5	2	0	0	0	0
03/04	5	5	0	0	0	0	0
04/05	3	3	0	0	0	0	0
05/06	5	5	0	0	0	0	0
06/07	3	3	0	0	0	0	0
07/08	2	2	0	0	0	0	0
08/09	1	1	0	0	0	0	0
09/10	0	0	0	0	0	0	0
10/11	0	0	0	0	0	0	0
11/12	0	0	0	0	0	0	0

Los Angeles County Municipal Storm Water Permit (Order 01-182)
Individual Annual Report Form
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14. What is the average response time after an illicit discharge is reported?

1 hour

a) Did any response times exceed 72 hours? Yes ☐ No ☒

b) If yes, explain why.

15. Describe the your agency's spill response procedures.

The City contracts with the County Fire Department for hazmat services. When a spill of any kind is reported, the Sherriff's Department is the contact/response agency. If they determine that the substance is unknown and possibly hazardous, they immediately notify the Hazmat team and the incident is handled by them from that point on.

16. What would you do differently to improve your agency's IC/ID Elimination Program?

None at this time.

17. Attach a list of all permitted connections to your storm sewer system.

Los Angeles County Municipal Storm Water Permit (Order 01-182)
Individual Annual Report Form
Attachment U-4

V. Monitoring

Briefly describe any storm water monitoring activities that are not required by Order No. 01-182 that your municipality conducted, participated in, or received funding to conduct in the past fiscal year. These activities should correspond with the dollar amount you listed in Table 2.

VI. Assessment of Program Effectiveness

- A. Attach a summary of the effectiveness of your storm water management program. This summary should include, at a minimum, the following:
1. An assessment of your agency's compliance with permit requirements, based on your responses to the questions in this form;
 2. Descriptions of any evaluation methods that your agency uses to determine the effectiveness of your storm water management program;
 3. A summary of the strengths and weaknesses of your agency's storm water management program;
 4. A list of specific program highlights and accomplishments;
 5. A description of water quality improvements or degradation in your watershed over the past fiscal year;
 6. Interagency coordination between cities to improve the storm water management program;
 7. Future plans to improve your agency's storm water management program; and
 8. Suggestions to improve the effectiveness of your program or the County model programs.
- B. On a scale of 1 to 10 (10 being full implementation of requirements by their deadlines), rate your municipality's level of compliance with Order No. 01-182.
- C. List any suggestions your agency has for improving program reporting and assessment.

Los Angeles County Municipal Storm Water Permit (Order 01-182)
Individual Annual Report Form
Attachment U-4

VII. Certification Statement

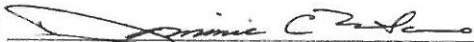
"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted.

Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility, of a fine and imprisonment for knowing violations.

Executed on the 4 day of September, 2012,

at Walnut, CA.

Printed Name Dominic Milano Title City Engineer

(Signature) 

Signature by duly authorized representative



Spring Clean-Up! April 12 – 14, 2012

Raise your dustpans in celebration of the City's very own April Spring Clean-Up! For three days the community is invited and encouraged to take advantage of bins placed at three locations throughout the City to dump bulky items for FREE.

Burrtec will be collecting non-hazardous waste. Please no tires, commercial waste and hazardous waste. Acceptable items include appliances such as dishwashers, refrigerators, stoves, water heaters; furniture such as chairs, couches, mattresses; or other miscellaneous items such as bundles of lumber/tree branches (48" max length) and toys.



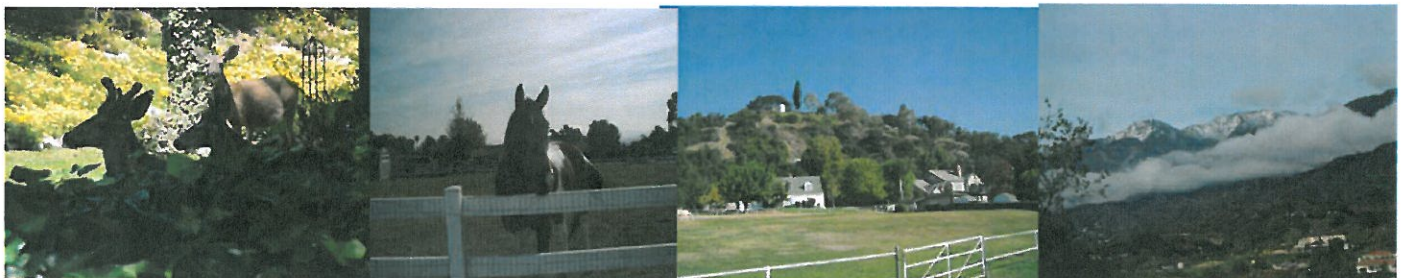
Drop-Off Locations	Thursday/Friday	Saturday
City Hall	8:00am – 5:00pm	8:00am – 3:00pm
Corner of Deodar Ln./Bliss Canyon Rd.	8:00am – 5:00pm	8:00am – 3:00pm
Corner of Mt. Olive Dr./Gardi St.	8:00am – 3:00pm	8:00am – 3:00pm

For more information, please contact City Hall at (626) 358-3218.

Earth Day - Looking for Volunteers



If you are in Jr. High or High School, come help clean our trails and improve the environment! Bradbury is partnering with the City of Duarte to host an Earth Day event on Saturday, April 21st from 9:00am to 1:00pm. Teens from both cities will plant trees at the Duarte Teen Center and clean Duarte's Bioswale, Nature Trail and Bradbury's trail system. Participating young adults will be given a \$20 gift-card to Target and an Earth Day t-shirt (courtesy of Burrtec). Participants will also be provided lunch and a chance to win more gifts through a raffle! Come help keep Bradbury beautiful and clean-up the environment! For more information, contact Kevin Kearney, Bradbury's Management Analyst, at (626) 358-3218.





Free SMART Gardening Workshops



Hosted by the Upper San Gabriel Valley Municipal Water District

Smart Gardening (English Class) ~ Wednesday, November 2, 2011 from 6:30 pm to 9:30 pm.

Smart Gardening (Spanish Class) ~ Wednesday, November 9, 2011 from 6:30 pm to 9:30 pm.

The Smart Gardening workshop is a free 3-hour workshop that offers key information for developing and keeping a water efficient garden. The class offers a basic understanding of water management techniques that help ensure a green and healthy garden while managing water use.

The classes will take place at the Upper District's office located at 602 E. Huntington Dr., Suite B, Monrovia, CA 91016. These classes are free and open to the public; anyone can attend, yet space is limited to 45 attendees. People interested in attending must call 626-443-2297 to reserve a seat.

GARDEN DESIGN CONCEPTS - Get an introduction to implementing a design plan for garden installation or renovation. Learn about water efficient garden design concepts, the use of plant material and the garden's relationship with the surrounding environment.

IRRIGATION BASICS FOR THE HOMEOWNER - Find out about the basic components, installation and maintenance of a residential irrigation system. Discover frequent pitfalls for water efficient gardens, common irrigation problems and their remedies.

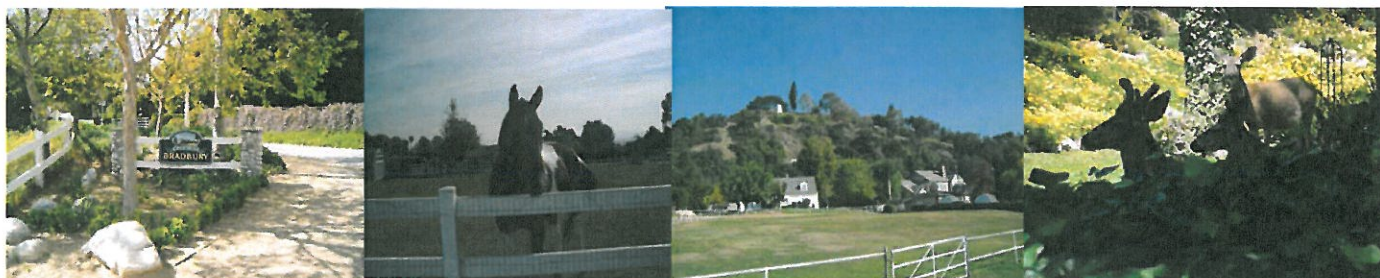
WATER EFFICIENT PLANTS - Learn about the importance of using water efficient plant material in the garden. Get a look at readily available water efficient plant materials that are well suited for the garden and maintenance tips on how to keep such plants healthy.

IRRIGATION SCHEDULING & MAINTENANCE GUIDELINES - Uncover the four factors involved in irrigation scheduling: weather, plants, soils and irrigation system. Learn how to develop a watering schedule for the garden and get practical guidelines and tips for amending soils, fertilizing and other general garden maintenance related items.



Fall Back on Sunday, November 6th ... Time for a time change!

Time reverts to standard time at 2 a.m. on the first Sunday of November. So set those clocks back an hour when you go to sleep on Saturday night! Also take the opportunity to check and replace the batteries in your smoke and carbon monoxide (CO) alarms. Replace any smoke alarms older than ten years. Replace any CO alarms older than five years.



Bradbury News

Vision 2030 Bradbury

Community Workshop on the Bradbury General Plan

How do you see Bradbury in 2030?

Help identify important issues and share what you love about Bradbury. What do you think Bradbury's future should look like? Everyone is invited to attend the community workshop on the General Plan update, which guides future development in the community.

September 10, 2012

Bradbury Civic Center

6:00 – 7:30 pm

To learn more about this workshop on the General Plan Update, to be added to the a contact list to receive future notifications of future meetings or updates or if you can't make the meeting but still want to offer ideas, please call or email Kevin Kearney 626-358-3218 or kkearney@cityofbradbury.org

Recycle Used Motor Oil!

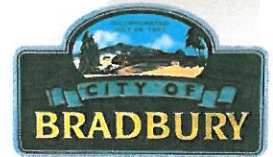


The City of Bradbury has free oil recycling containers, rags and funnels available for homeowners who change their own oil. *Why recycle used oil?* Used motor oil is insoluble, persistent and can contain toxic chemicals and heavy metals. It's slow to degrade and sticks to everything from beach sand to bird feathers. Used motor oil is a major source of oil contamination of waterways and can result in pollution of drinking water sources.

If you change your own motor oil, protect our environment by recycling this valuable resource. Take your used motor oil to your nearest collection center, such as a service station, lube center or automotive store. To find your nearest used oil collection center, call 800- CLEANUP or visit www.cleanup.org.

Too Toxic to Trash

Household Hazardous Waste/E-Waste can be disposed of on **Saturday, August 18th** at the Santa Anita Race Track: Gate 6 on Colorado Place in the City of Arcadia. The event will start at 9:00am and end at 3:00pm. Examples of Household Hazard Waste include brake fluid, paint, paint thinner, cleaners with acid or lye, pesticides or herbicides, household batteries and car batteries, pool chemicals, motor oil, filters, and expired pharmaceuticals. E-Waste includes computer monitors, televisions, CPU's, printers, etc. For more information, please visit www.CleanLA.com



August 2012

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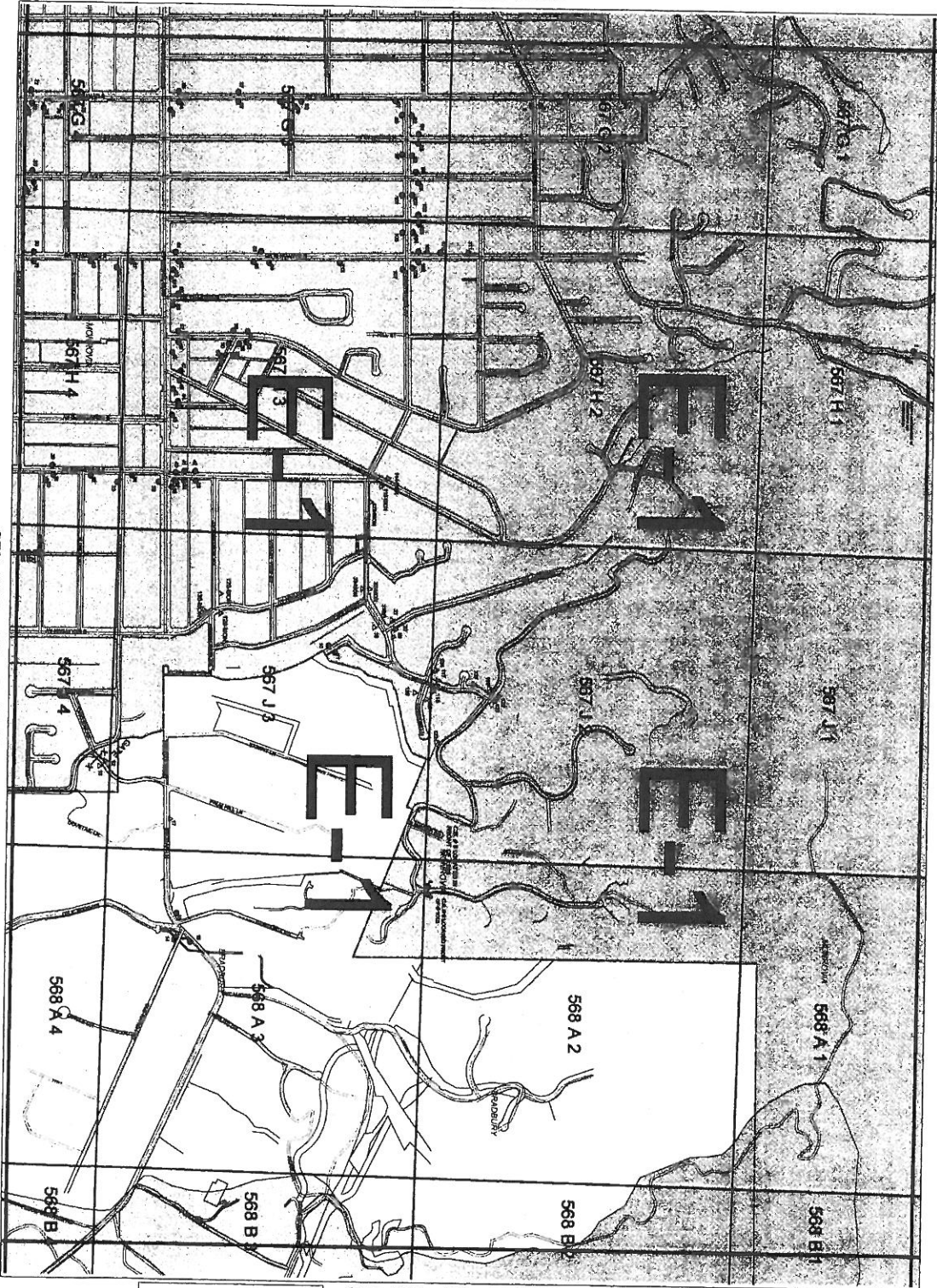
Bradbury Finance Committee	2
Ideas for Brick Customization	2
SNAP Information	5
Volunteers on Patrol	5

City Council

Mayor Lathrop, District 4	bruce.lathrop@cityofbradbury.org
Mayor Pro-Tem Pycz, District 5	rick.pycz@cityofbradbury.org
Councilmember Barakat, District 3	barakat1911@aol.com
Councilmember Hale, District 1	dick.hale@cityofbradbury.org
Councilmember Lewis, District 2	monte.lewis@cityofbradbury.org

SEE SHT. NO. 2118

NOT PRINTED:
06-06-2009

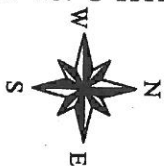


SEE SHT. NO. 2164

SEE SHT. NO. E-2166

Los Angeles River Watershed

SEE SHT. NO. E-2211



Catch Basins

- RMD (Clean)
- LACFCD (Clean)
- LACFCD (Dirt Clean)
- ▲ City (Clean)
- △ City (Dirt Clean)
- * Unassigned

NUMBER OF CATCH BASINS
TO BE CLEANED ON THIS PAGE:

For the City of:
BRAEBURY

LACFCD: 3

Total: 3

Grid Layout

2	1
3	4

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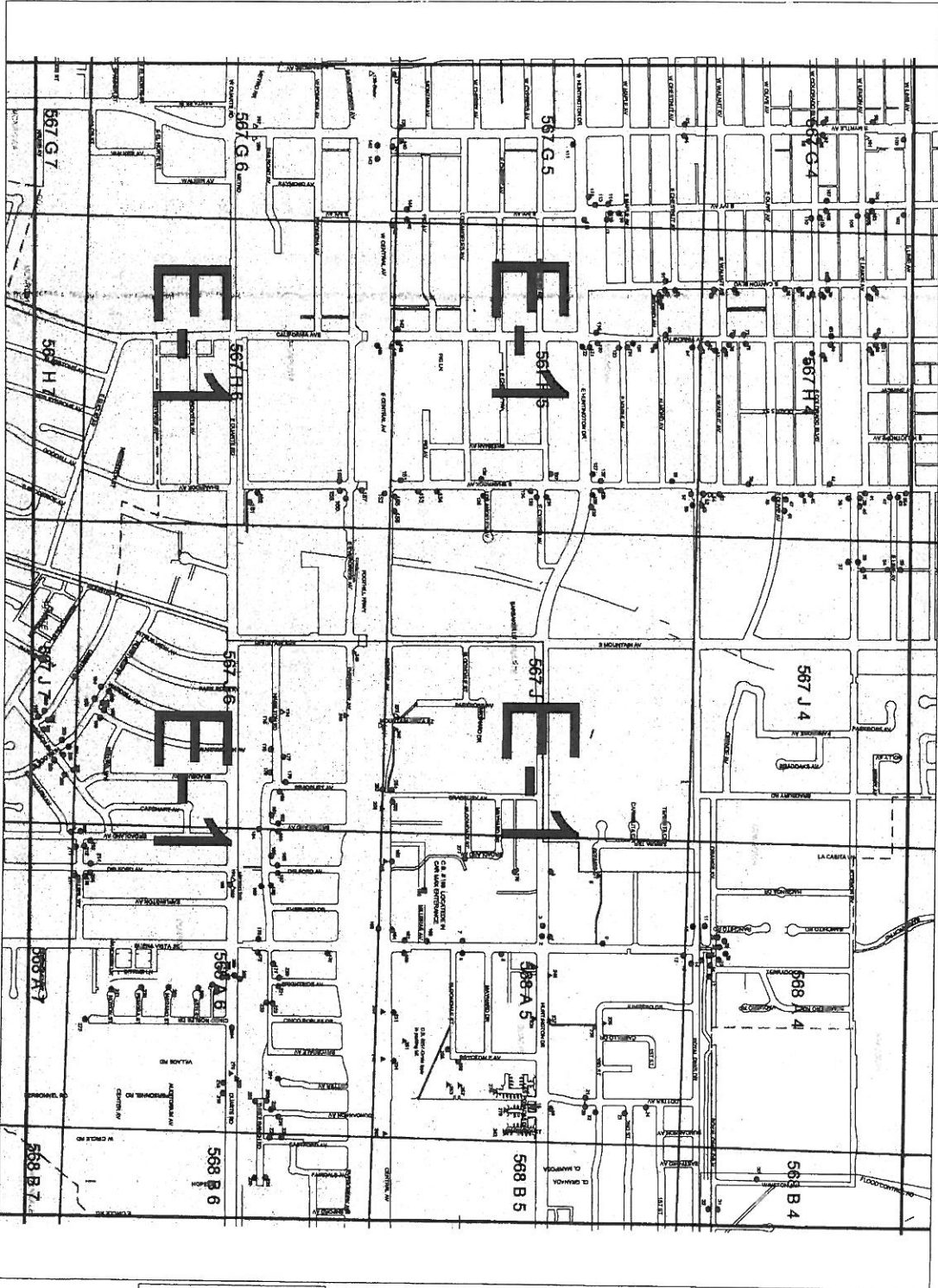
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DATE PRINTED:
03-21-2008

SEE SHT. NO. E-2119



SEE SHT. NO. E-2167

San Gabriel River Watershed, Et Al.

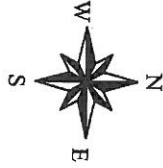
MG-5671-J-5

SEE SHT. NO. 2165

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SEE SHT. NO. E-2212

Catch Basins

- RWD (Clean)
- LACFCD (Clean)
- LACFCD (Don't Clean)
- City (Clean)
- City (Don't Clean)
- Unassigned

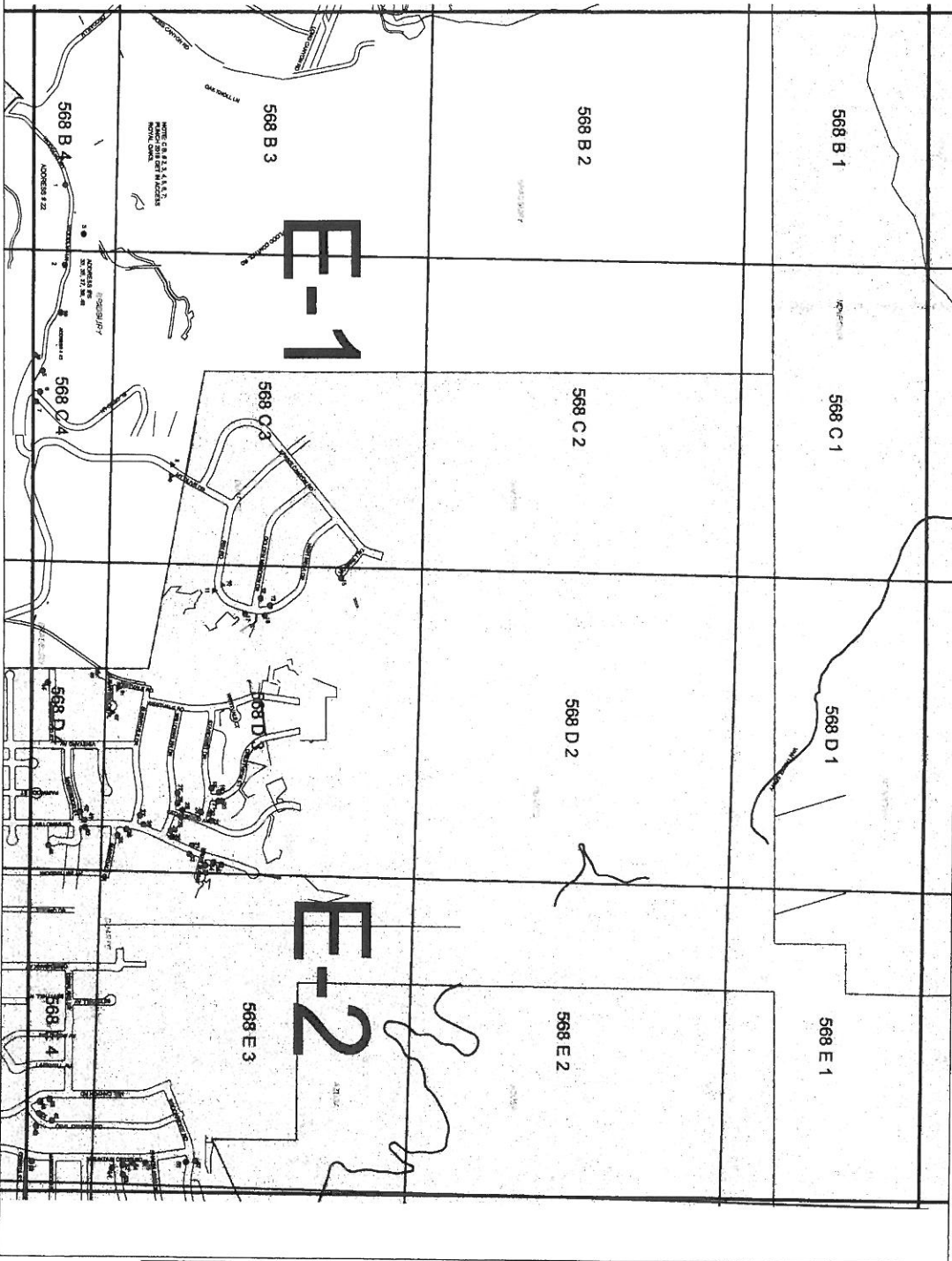
NUMBER OF CATCH BASINS
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For the City of:
BRADBURY

LACFCD: 2

Total: 2

SEE SHT. NO. 2165



SEE SHT. NO. E-2212

San Gabriel River Watershed, Et Al.

SEE SHT. NO. 2210

Grid Layout

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3	4

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SEE SHT. NO. E-2254



Catch Basins

- RWD (Clean)
- LACFCD (Clean)
- LACFCD (Don't Clean)
- ▲ City (Clean)
- △ City (Don't Clean)
- * Unassigned

NUMBER OF CATCH BASINS
TO BE CLEANED ON THIS PAGE:

For the City of:

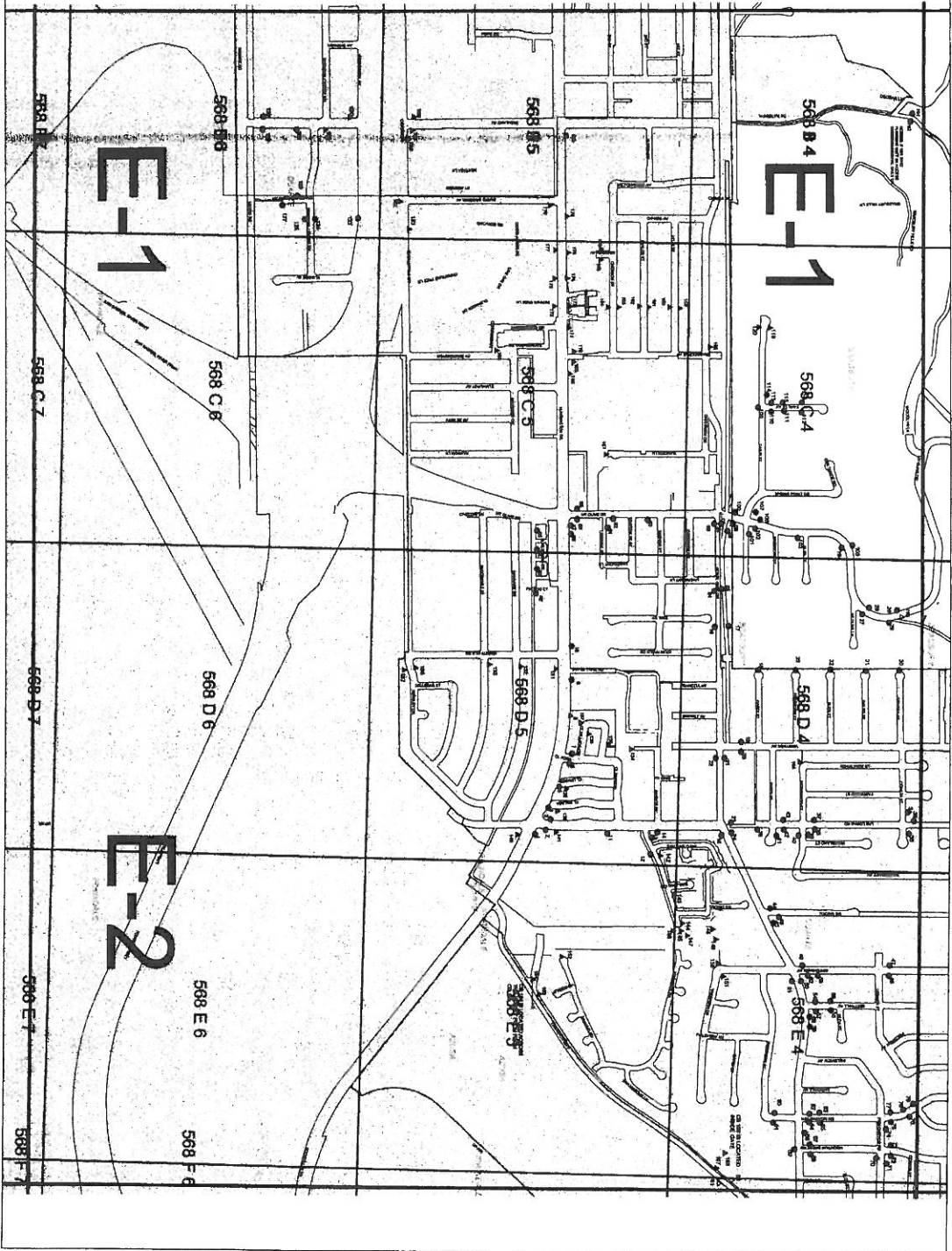
BRADBURY

City: 2

LACFCD: 8

Total: 10

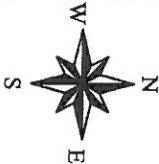
SEE SHT. NO. E-2166



SEE SHT. NO. E-2213

San Gabriel River Watershed, Et Al.

SEE SHT. NO. E-2255



Catch Basins

- RWD (Clean)
- LACRCD (Clean)
- LACRCD (Don't Clean)
- ▲ City (Clean)
- △ City (Don't Clean)
- * Unassigned

NUMBER OF CATCH BASINS
TO BE CLEANED ON THIS PAGE:
For the City of
BRADBURY

City: 2
LACRCD: 23
Total: 25

Grid Layout

2	1
3	4

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NPDES Staff Training Summary 2011-2012
City of Bradbury

Name	Department	Type	Date
Cody Howing	Engineering	LARB MS4 Permit Workshop	11/10/2011
Cody Howing	Engineering	LARB MS4 Permit Workshop	1/23/2012
Michelle Keith	Administration	USEPA LA River	2/27/2012
Cody Howing	Engineering	LARB MS4 Permit Workshop	3/1/2012
Michelle Keith	Administration	LARB MS4 Permit Workshop	3/1/2012
Cody Howing	Engineering	LARB MS4 Permit Workshop	4/5/2012
Michelle Keith	Administration	LARB MS4 Permit Workshop	4/5/2012
Michelle Keith	Administration	SGVCOG MS4 Permit Workshop	4/18/2012
Cody Howing	Engineering	LARB MS4 Permit Workshop	5/3/2012
Michelle Keith	Administration	LARB MS4 Permit Workshop	5/3/2012
Cody Howing	Engineering	LARB MS4 Permit Workshop	7/9/2012
Michelle Keith	Administration	LARB MS4 Permit Workshop	7/9/2012

IC/ID IMPLEMENTATION PLAN

The City of Bradbury proposes to follow the IC/ID Program as stated in the Los Angeles County Storm Water Quality Management Plan (SQMP). Implementation will include the available forces including the Los Angeles County Sewer Maintenance District, County Road Department, City field staff, and the public at large.

The City of Bradbury maintains a Citizen complaint process for a wide variety of issues. When the City receives a complaint, it is routed to the appropriate department and a staff member is dispatched to investigate.

1. If the staff member identifies the discharge as exempt under the permit, notes are made to that effect and the person complaining is notified of the results of the investigation.
2. If the complaint is found to be active, the staff attempts to identify the source and nature of the discharge, and attempts to contain and eliminate the flow. The property owner is then notified of the violation and is told to desist any further discharge.
3. If the discharge is determined to be of an unknown nature, the City notifies the County Hazmat to assure that proper safety measures are taken. Once the case is turned over to the Hazmat team, Los Angeles County Fire, their incident commander handles all further response.

Assessment of Program Effectiveness

The City of Bradbury strives to comply with the permit requirements and improve water quality through plan review and BMPs to be included and implemented throughout project sites. The City also has implemented weekly street sweeping and annual catch basin cleaning to further the efforts of reducing storm water pollution. This year the catch basin cleaning yielded approximately 420 pounds of trash that had accumulated in the catch basins.

As part of a recent landscaping improvement project located at the Civic Center, the City included drought tolerant landscaping. The utilization of such plants reduced the need for irrigation and further promoted the use of native drought tolerant plant species throughout the community.

The City of Bradbury co-sponsored with the City of Duarte, education programs and various community cleanup projects for Earth Day 2012. Activities included trash removal from local hiking trails and opportunities for the public to receive information on improving the local environment.

The City has actively coordinated with both the Los Angeles River Watershed Management Committee and the San Gabriel River Watershed Management Committee on topics related to existing and future NPDES issues. The City of Bradbury also works with neighboring cities to implement used oil recycling and public outreach programs.

The City's NPDES program has been found to be effective. At this time there are no suggested changes or structural BMPs that the City would like to recommend. Looking forward to the adoption of the new MS4 permit, the City will attempt to continue the implementation of programs and policies that reduce storm water pollution with consideration to the fiscal limitations that the City is under.